

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

NISSAN NORTH AMERICA, INC.)	
)	
Plaintiff,)	
)	Civil Action No. 3:19-cv-00450
v.)	
)	Judge Eli Richardson
ATS AUTOMATION GLOBAL)	
SERVICES USA, INC.; ATS ASSEMBLY)	JURY DEMAND
AND TEST, INC.,)	
)	
Defendants.)	

MOTION TO WITHDRAW AS COUNSEL OF RECORD

Comes now George Nolan, who is counsel of record for the Plaintiff Nissan North America, Inc. (“Nissan”), and respectfully moves this Court for permission to withdraw as counsel of record in these proceedings. As grounds for this motion, Movant respectfully states:

1. Mr. Nolan recently accepted a position as Senior Attorney in the Nashville office of the Southern Environmental Law Center (“SELC”). SELC is a public interest law firm with nine offices in six southern states and Washington DC. SELC works to enforce and strengthen laws and policies that protect the South’s natural resources and the health and well-being of its people. As a result of accepting that position, Mr. Nolan is winding up his private law practice as he prepares to practice in the area of public interest environmental law.

2. Mr. Nolan’s responsibilities as lead counsel for Nissan will be assumed by his law partner, Gino Bulso. Mr. Bulso is already counsel of record in these

proceedings, and he is fully capable of continuing the prosecution of the Plaintiff Nissan's claims.

3. Mr. Nolan has consulted with Nissan regarding this matter, and Nissan has no objection to Mr. Nolan withdrawing from this litigation.

4. Mr. Nolan has consulted with the ATS Defendants, and defense counsel has confirmed that the Defendants do not oppose this motion.

Respectfully submitted,

LEADER, BULSO & NOLAN, PLC

/s/ George Nolan

Eugene N. Bulso, Jr. (B.P.R. No. 12005)

George Nolan (B.P.R. No. 14974)

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Attorneys for Nissan North America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2020, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notification of such filing to the following counsel of record:

Dwight E. Tarwater
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Knoxville, Tennessee 37902

/s/ George Nolan

George Nolan